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May 1, 2006

RECEIVED

MAY - 1 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Re: CC Docket 94-102
E911 Handset Penetration Quarterly Report
Cellular South Licenses, Inc.

Dear Ms. Dortch:

On behalf of Cellular South Licenses, Inc. ("Cellular South"), there is submitted herewith a report of the status of the carrier's progress in achieving 95% systemwide handset of location-capable handsets.

Cellular South is a Tier III digital wireless carrier operating cellular radiotelephone and personal communications services mainly in Mississippi, Tennessee, Alabama and the Florida panhandle, as well as in Arkansas and Louisiana. This report is submitted in compliance with the terms of the *Order*, CC Docket No. 94-102, FCC 05-215, released December 29, 2005, conditionally granting Cellular South an extension through March 29, 2007, of the deadline for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v).

Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

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May 1, 2006
Federal Communications Commission
Page two

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Pamela L. Gist". The signature is written in a cursive, flowing style with a large initial "P" and a long horizontal stroke at the end.

Pamela L. Gist

CELLULAR SOUTH LICENSES, INC.

E911 REPORT

MAY 1, 2006

The following information is submitted in accordance with FCC directive:

1. The number and status of Phase II requests from Public Safety Answering Points

Within the wireless service area of Cellular South Licenses, Inc. ("Cellular South"), there are a total of 196 PSAPs. Of those, sixty-two have requested Phase II services. Fifty-seven of those PSAPs have become capable of receiving and utilizing Phase II data. Cellular South is delivering Phase II data, and it is being processed by those fifty-seven PSAPs. Two PSAPs in Newton County, Mississippi requested Phase II service on August 17, 2005. A PSAP in Lincoln County, Mississippi requested Phase II service on November 10, 2005. Four PSAPs in Santa Rosa County, Florida requested Phase II service on February 2, 2006.

2. The dates on which Phase II service will be available to PSAPs served by Cellular South's wireless network

Cellular South began to deliver Phase II data to the two Newton County PSAPs on January 26, 2006. Cellular South began to deliver Phase II data to the Lincoln County PSAP on April 18, 2006. Cellular South plans to start delivering Phase II data to the Santa Rosa PSAPs by August 2006. Cellular South stands ready to

timely honor future requests for Phase II services as they are received from PSAPs and as the PSAPs become capable of receiving and processing Phase II data.

3. The status of coordination efforts with PSAPs for alternative 95% handset penetration dates

Cellular South is actively working with the PSAPs to keep them informed of the carrier's progress in achieving higher location-capable handset penetration rates. Janie Shelton, Director of Network Services for Cellular South, contacts each PSAP regularly to report the current penetration figure. No PSAP has expressed objection to the projected schedule. Attached are copies of the text of letters Ms. Shelton sends to Counties and PSAP representatives. One letter format is sent to PSAPs who currently receive and process Phase II data or whose deployment status is known to Cellular South. Another letter format is sent to PSAPs who have not informed Cellular South of their E911 Phase II status. In February 2006 a total of ninety-two letters were sent, and thirty responses were received from entities informing Cellular South of the projected E911 schedule of non-Phase II PSAPs. In its next mailing Cellular South will encourage responses from those who have not responded and will keep all informed of Cellular South's progress.

4. Efforts to encourage customers to upgrade to location-capable handsets

Cellular South has notified customers as to which PSAPs located within Cellular South's service area are capable of receiving and processing the Phase II E911 data that is being delivered to them by Cellular South, when other PSAPs are

expected to be capable, and when still others are expected to begin the Phase II process by submitting requests for data. See attached sample. By means of billing inserts and bill messages, customers are informed that by upgrading their handsets they will have the ability to automatically transmit their location information to emergency officials when they call 911.

Cellular South also continues its advertising campaign to encourage customers to adopt upgraded handsets. Ads have targeted TDMA and analog customers with special offers on the trade-in of their old handsets for location capable handsets. Promotional offerings include a free phone for switching to the CDMA system. Promotions for phones with cameras, ringtones, color screens and other features are also used to lure customers into upgrading their handsets. The campaigns advertise the safety and coverage advantages of the CDMA system. Special offers are disseminated by direct mail, text messaging and radio/tv ads.

5. The percentage of customers with location-capable phones

As of April 30, 2006, approximately 92% of Cellular South's subscribers were using Phase II location-capable handsets.

6. Status in achieving compliance and whether Cellular South is on schedule to meet its revised 3/29/07 deadline

Cellular South maintains its policy of selling and activating only location-capable digital handsets. It continues to promote its CDMA network facilities and to conduct marketing campaigns to encourage consumer adoption of new handsets. The penetration rate of location capable handsets is increasing, and Cellular South expects to be compliant no later than March 29, 2007.

February 1, 2006

Dear PSAP / 911 Coordinator,

The Federal Communications Commission ("FCC") has required wireless companies such as Cellular South to provide Public Safety Answering Points (PSAPs) with Automatic Location Identification (ALI) information for 911 calls. Cellular South has chosen to provide ALI information by deploying location information technology in subscribers' handsets (a handset-based solution). However, before a wireless company's obligation to provide E911 service is triggered, a PSAP must make a valid request for E911 service, *i.e.*, the PSAP must be capable of receiving and utilizing the data elements associated with the service and must have a mechanism in place for recovering its costs.

Our records indicate that your PSAP(s) are currently delivering Phase II E911 data. Cellular South appreciates your aggressive approach to this new technology.

Presently, 100% of all new digital handsets activated on Cellular South's system are location capable and have been since late November 2004. As of January 15, 2006, approximately 91% of Cellular South's subscribers were using Phase II location capable handsets. The FCC has ordered that all carriers meet a 95% penetration rate of location capable handsets. Cellular South must achieve this penetration rate by March 29, 2007. They have also encouraged us to actively work with PSAPs to keep them informed of our progress in achieving higher location capable handset penetration rates. We will be updating you quarterly on our progress in achieving a 95% penetration rate.

Please let us know if this letter needs to go to someone else in the future. We look forward to working with you to ensure that the important public safety needs of wireless callers requiring emergency assistance are met as quickly as possible.

Sincerely,

Janie Shelton,
Director of Network Services
Cellular South

February 1, 2006

Dear PSAP / 911 Coordinator,

The Federal Communications Commission ("FCC") has required wireless companies such as Cellular South to provide Public Safety Answering Points (PSAPs) with Automatic Location Identification (ALI) information for 911 calls. Cellular South has chosen to provide ALI information by deploying location information technology in subscribers' handsets (a handset-based solution). However, before a wireless company's obligation to provide E911 service is triggered, a PSAP must make a valid request for E911 service, *i.e.*, the PSAP must be capable of receiving and utilizing the data elements associated with the service and must have a mechanism in place for recovering its costs.

Presently, 100% of all new digital handsets activated on Cellular South's system are location capable and have been since late November 2004. As of January 15, 2006, approximately 91% of Cellular South's subscribers were using Phase II location capable handsets. The FCC has ordered that all carriers meet a 95% penetration rate of location capable handsets. Cellular South must achieve this penetration rate by March 29, 2007.

The FCC has ordered Cellular South to notify customers when PSAPs are reasonably expected to make valid requests for Phase II service. They have also encouraged us to actively work with PSAPs to keep them informed of our progress in achieving higher location capable handset penetration rates. We will be updating you quarterly on our progress in achieving a 95% penetration rate. Also, we would ask you to let us know when you plan to request Phase II E911 service from Cellular South. Please use the attached form and return it to us in the enclosed self-addressed stamped envelope.

Please let us know if this letter needs to go to someone else in the future. We look forward to working with you to ensure that the important public safety needs of wireless callers requiring emergency assistance are met as quickly as possible.

Sincerely,

Janie Shelton,
Director of Network Services
Cellular South

E911 Coordinators,

Please return this form in the enclosed self-addressed stamped envelope.

Approximate date when you plan to request Phase II E911 service from Cellular South

Please check below if you have no current plans to request Phase II E911 service from Cellular South

List PSAPs located within your county

[illegible][illegible][illegible]

IMPORTANT SUBSCRIBER SAFETY INFORMATION

At Cellular South we know safety is your most important call especially when dialing 911 for emergency services using your cellular phone. We're working with Public Safety Answering Points (PSAPs) throughout our service area to enable rescue personnel to find you even if you cannot convey your location when you call. Several local PSAPs have already upgraded their systems and are capable of receiving critical location data that Cellular South delivers to them. This is called being e911-Phase II compliant.

The counties with this capability are:

Alabama - Mobile County

Florida - Escambia, Okaloosa and Walton Counties

Mississippi - Adams, Forrest, Jackson, Jones, Newton, Oktibbeha and Stone Counties

Tennessee - Fayette, Gibson, Haywood, Madison, Shelby and Tipton Counties

Cellular South stands ready to timely implement future requests for Phase II services as they are received from PSAPs. We will update you as additional PSAPs become capable of receiving and processing Phase II data. Please note, **only phones utilizing Cellular South's CDMA network are capable of transmitting location data to PSAPs.** These include all phones purchased from Cellular South since November 26, 2004, and many before that date. **TDMA and Analog phones do not have location capability.**

Upgrading to a CDMA handset will ensure your location information will be automatically transmitted to emergency officials when you dial 911 in areas where the service is available. Call **1.877.9CSOUTH** (1.877.927.6884) today for a special offer if you don't have a CDMA handset. Receive free next-business day delivery when you call by 3:30 p.m.